

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**

Montage Mortgage, LLC

Plaintiff,

vs.

Pacific Union Financial, LLC, John Perry, Valerie Coleman, Caitlin V. Cooke, Eduardo Creque, Jessica M. Furr (Keen), Kathy Keller, Fouad Naghmi, Tammy Neal, Charles F. Peer, Michaelene Whyte, and Melissa Willoby,

Defendants.

Case No.: 3:17-cv-02971-S

**REQUEST FOR ENTRY OF JUDGMENT**

Pursuant to Federal Rule of Civil Procedure 68(a), Plaintiff Montage Mortgage, LLC (“Montage”) hereby requests that Judgment be entered for it against Defendant Pacific Union Financial, LLC (“Pacific Union”) in the amount of \$400,000.

On August 17, 2018, Defendant Pacific Union served Plaintiff Montage with an Offer of Judgment under Federal Rule of Civil Procedure 68. The Offer is attached hereto as Exhibit A.

On August 29, 2018, Plaintiff Montage served Defendant Pacific Union a Notice of Acceptance of the Offer, which is attached hereto as Exhibit B.

Proof of service of the Offer and Acceptance are enclosed within Exhibit A and B.

WHEREFORE, Plaintiff Montage requests that Judgment be entered against Defendant Pacific Union in the amount of \$400,000.

Dated: August 30, 2018

Respectfully submitted,

/s/ Jeffrey P. Blackwood

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**ATTORNEYS FOR PLAINTIFF  
MONTAGE MORTGAGE, LLC**

**CERTIFICATE OF SERVICE**

I certify that on August 30, 2018, I caused a copy of the foregoing REQUEST FOR ENTRY OF JUDGMENT be served via electronic mail and First Class Mail upon the following parties and counsel of record:

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/S/ *Jeffrey Blackwood*  
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